

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No.: 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50,

Defendants.

DECLARATION OF RENA ANDOH

RENA ANDOH, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declares the following to be true and correct:

1. My name is Rena Andoh. I am a partner at Sheppard, Mullin, Richter & Hampton LLP. I am over the age of 18 years old. I have personal knowledge of the matters set forth herein and if called as a witness, I could and would competently testify as to all facts set forth herein. I am counsel for plaintiff Moog Inc. (“Moog”) and I provide this declaration in support of Moog’s Motion for Scheduling Orders.

2. Attached as Exhibit “A” is a true and correct copy of Moog’s proposed revised schedule for expedited discovery and briefing/hearing for Moog’s Motion for Preliminary Injunction, redlined against defendant Skyryse, Inc.’s (“Skyryse”) proposal.

3. Attached as Exhibit “B” is a true and correct copy of e-mail correspondence dated April 4, 2022 between the parties and iDiscovery Solutions, regarding the electronic devices turned over by defendants Misook Kim and Robert Alin Pilkington.

4. Attached as Exhibit “C” is a true and correct copy of a letter served by counsel for Skyryse on April 1, 2022.

5. Attached as Exhibit “D” is a true and correct copy of a letter served by counsel for Moog on April 27, 2022.

6. [REDACTED]

[REDACTED]

7. Attached as Exhibit “F” is a true and correct copy of a letter served by counsel for Skyryse on April 29, 2022.

8. Attached as Exhibit “G” is a true and correct copy of a letter served by counsel for Skyryse on May 5, 2022.

9. Attached as Exhibit “H” is a true and correct copy of e-mail correspondence between counsel for Moog and Skyryse between May 13-16, 2022 regarding Skyryse’s contemplated “supplemental productions” in response to the Court’s March 11 Order.

10. Attached as Exhibit “I” is a true and correct copy of meet and confer e-mail correspondence between counsel for Moog and Skyryse between May 17-19, 2022.

11. Attached as Exhibit “J” is a true and correct copy of e-mail correspondence between counsel for Moog and Skyryse between March 17-23, 2022.

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: May 23, 2022

/s/ Rena Andoh

Rena Andoh